

**DANIEL S. SIMON, ESQ.**

Nevada Bar No. 4750

**BENJAMIN J. MILLER, ESQ.**

Nevada Bar No. 10406

**ASHLEY M. FERREL, ESQ.**

Nevada Bar No. 12207

**SIMON LAW**

810 South Casino Center Boulevard

Las Vegas, Nevada 89101

Telephone (702) 364-1650

Facsimile (702) 364-1655

lawyers@simonlawlv.com

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

MICHELLE C. ZEITER, individually, and as  
Special Administrator for ESTATE OF  
MICHAEL BUCHNA; JENNIFER C. BEAM,  
individually, and as Special Administrator for  
ESTATE OF MICHAEL S. BUCHNA,

Plaintiffs,

v.

WALMART INC., a foreign corporation d/b/a  
WALMART SUPERCENTER #3351; and  
WAL-MART STORES, INC., a foreign  
corporation; and DOES I through X; inclusive;  
and ROE CORPORATIONS I through V,  
inclusive,

Defendants.

CASE NO.: 2:21-cv-00061-RFB-DJA

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO FILE AND  
SERVE PLAINTIFFS' REPLY TO  
DEFENDANTS' RESPONSE TO  
PLAINTIFFS' MOTION FOR  
SUMMARY JUDGMENT**

IT IS HEREBY STIPULATED by and between Plaintiffs MICHELLE C. ZEITER,  
Individually and as Special Administrator for ESTATE OF MICHAEL BUCHNA and  
JENNIFER C. BEAM, Individually and as Special Administrator for ESTATE OF MICHAEL  
S. BUCHNA (collectively "Plaintiffs"), by and through their attorneys of record SIMON LAW  
and BROCK H. OHLSON PLLC, and Defendants WALMART, INC. and WAL-MART

1 STORES, INC. (collectively “Defendants”), by and through their attorneys of record, HALL &  
2 EVANS, LLC, (foregoing parties are collectively referred to hereinbelow as “Parties”) hereby  
3 submit their Stipulation and Order to Extend Deadline to File and Serve Plaintiffs’ Reply to  
4 Defendants’ Response [ECF No. 162], filed August 20, 2024, to Plaintiffs’ Motion for  
5 Summary Judgment [ECF No. 159], filed July 19, 2024, pursuant to LR IA 6-1. This is the  
6 third stipulation for extension of deadlines to Plaintiffs’ Motion for Summary Judgment.

7 REASONS FOR REQUESTING AN EXTENSION OF DEADLINES

8 The Parties aver that good cause exists to extend the existing deadline for Plaintiffs’  
9 Reply by 14 days from the date of the September 20, 2024 request, which would be Friday,  
10 October 4, 2024. Plaintiffs’ counsel has continued to encounter several conflicts due to other  
11 scheduling matters, most notably a complex federal insurance bad-faith litigation case that has  
12 resulted in significant briefing of multiple motions, including discovery and dispositive  
13 motions, all due near or by September 26, 2024. Plaintiffs’ counsel’s firm, Simon Law, is  
14 comprised of three attorneys and this matter has significantly consumed its resources recently.  
15 The Parties will not be seeking any additional extensions for this matter.

16 Thus, the parties have agreed to extend the respective response Reply deadline 14 days  
17 as set forth below:

18 ///

19 ///

20 ///

- Plaintiffs' deadline to file and serve a reply:

• Existing deadline: Friday, September 20, 2024

• **Proposed deadline: Friday, October 4, 2024**

Dated this 20 day of September, 2024.

**SIMON LAW**

*/s/ Daniel S. Simon*

DANIEL S. SIMON, ESQ.  
Nevada Bar No. 4750  
BENJAMIN J. MILLER, ESQ.  
Nevada Bar No. 10406  
ASHLEY M. FERREL, ESQ.  
Nevada Bar No. 12207  
810 South Casino Center Boulevard  
Las Vegas, NV 89101  
*Attorneys for Plaintiffs*

Dated this 20 day of September, 2024.

**HALL & EVANS, LLC**

*/s/ Kurt R. Bonds*

KURT R. BONDS, ESQ.  
Nevada Bar No. 6228  
TANYA M. FRASER, ESQ.  
Nevada Bar No. 13872  
1160 North Town Center Drive  
Suite 330  
Las Vegas, NV 89144  
*Attorneys for Defendants*

**IT IS SO ORDERED.**

  
UNITED STATES DISTRICT JUDGE

**DATED: September 23, 2024**